

United States District Court

DISTRICT of ARIZONA

United States of America

DOCKET NO.

v.

Amanda Henley

MAGISTRATE'S CASE NO.

DOB: xx-xx-1981; United States Citizen

13-08304M

Complaint for violation of Title 8

United States Code §§1324(a)(1)(A)(ii) &
1324(a)(1)(B)(i)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about June 20, 2013, at or near Willcox, in the District of Arizona, **Amanda Henley**, knowing and in reckless disregard of the fact that certain illegal aliens, Jairo Abraham Garcia-Garcia, David Jimenez-Solis and Mario Alvarez-Martinez, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about June 20, 2013, at or near Willcox, Arizona, Border Patrol agents encountered and stopped a black Volkswagen sedan, driven by **Amanda Henley** with a passenger, traveling northbound on Highway 186. Upon approach agents noticed several individuals hiding underneath a sheet in the rear of the vehicle. When the agent began to conduct an immigration inspection on the occupants of the Volkswagen, **Amanda Henley** instructed the rear passengers not to say anything. The six passengers, including Jairo Abraham Garcia-Garcia, David Jimenez-Solis and Mario Alvarez-Martinez, admitted they were not citizens or nationals of the U.S. and that they did not possess documents to be in the U.S. legally.

The material witnesses stated they made arrangements to be smuggled into the United States and agreed to pay money. Each witness, with the exception of David Jimenez-Solis, stated that after crossing the international boundary fence they were transported to a residence. Jairo Abraham Garcia-Garcia and Mario Alvarez-Martinez stated a female driver arrived in a vehicle at the residence and instructed them to board and lie down. David Jimenez-Solis stated a female driver arrived in a vehicle at a location in the desert and instructed him to board and lie down. Jairo Abraham Garcia-Garcia and Mario Alvarez-Martinez positively identified **Amanda Henley** as the driver through photo line-ups.

MATERIAL WITNESSES IN RELATION TO THE CHARGE:

Jairo Abraham Garcia-Garcia, David Jimenez-Solis and Mario Alvarez-Martinez

DETENTION REQUESTED

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.

AUTHORIZED BY: AUSA DPF

SIGNATURE OF COMPLAINANT
(official title)OFFICIAL TITLE
Border Patrol Agent

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE¹⁾DATE:
June 20, 2013¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54